

## EXHIBITS

1. Exhibit "A" is plaintiff's request for production of documents and the defendants response denying them.....Ex."A"
2. Exhibit "B" are plaintiff Kerwin's request for production of documents and the defendants production of same; these are the same documents plaintiff requested but were denied by the defendants claiming a security issue (all marked Ex."B").....Ex."B"

## EXHIBITS

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DeFRANCO,  
Plaintiff,

V.

WILLIAM WOLFE, et al.,  
Defendants.

:  
: No. C.A. 04-230E  
: Magistrate Judge Baxter  
: District Judge Cohill  
:  
:  
:

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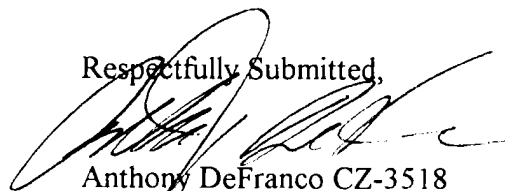
DEFENDANTS' RESPONSE TO  
PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff requests, in accordance with discovery Rules, the following documents:

1. Please produce the employee roster for the staff that were working at SCI Albion on March 7<sup>th</sup>, 2005, on the second shift (from 2 pm until 10 pm). SEE ATTACHED SHEET FOR RESPONSES.
2. Please produce the exact date on which a Ms. Eichenlaub (prior psychologist) stated she met with plaintiff regarding z-code. All prior responses have failed to answer this specific question. While defendants object to producing the actual 'document', providing plaintiff with a specific date of when Ms. Eichenlaub purportedly consulted with plaintiff does not pose a security issue, and is material to the case.
3. Please produce plaintiff's 'block reports', that is, a file that guards write in to report behavior.
4. Please produce plaintiff's complete cell location through-out his incarceration from 1993 until 2002; and when he was in a cell alone.

Date: June 9, 2006

Respectfully Submitted,



Anthony DeFranco CZ-3518  
10745 Route 18  
Albion, Pa. 16475-0002

**Certificate of Service**

Service was made by US First  
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Attorney General at 564  
Forbes Ave., Pgh. Pa. 15219

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DEFRANCO,

Plaintiff,

v.

WILLIAM WOLFE, ET AL.,

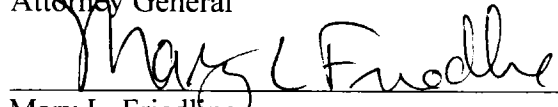
C.A. No. 04-230 E

**DEFENDANTS' RESPONSE TO PLAINTIFF'S THIRD  
REQUEST FOR PRODUCTION OF DOCUMENTS**

1. This request is Objected to as seeking information that is privileged, confidential, irrelevant and not likely to lead to the discovery of admissible information. Providing this Roster could pose as a security risk to staff, inmates and/or the institution.
2. This information is maintained within plaintiff's psychiatric records, which plaintiff recently had the opportunity to view.
3. This request has already been responded to in plaintiff's second request for documents.
4. The plaintiff's cell history has already been provided in plaintiff's second request for documents.

Respectfully submitted,

THOMAS W. CORBETT, JR.  
Attorney General

  
Mary L. Friedline  
Senior Deputy Attorney General  
Attorney I.D. No. 47046

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Date: June 19, 2006

Susan J. Forney  
Chief Deputy Attorney General